

### **REMARKS**

The above Amendment and the following Remarks are in Reply to the final Office Action dated 08/24/2004. Applicant has amended Claims 1, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 21, 22, 23, 24, 27, 28, 31, 32, 33 and 34 and have cancelled Claims 2, 7, 20 and 30. Thirty Claims remain pending in this Application of which Claims 1, 18, 27 and 28 are in independent form for reconsideration and further examination. In light of the amendments and this Reply, the Applicant respectfully requests reconsideration and further examination of this Application.

### **Rejection under 35 U.S.C. § 102**

In paragraph 2, page 2 of the Office Action, the Examiner rejected Claims 18, 25-26, and 28 under 35 U.S.C. 102(e) as being anticipated by Garreau (U.S. Pat. 6,769,035). In light of the above Amendments to independent Claims 1, 18, 27 and 28, and the Remarks that follow, this rejection is respectfully traversed.

#### **Claim 18, 25-26 and 28:**

Garreau fails to disclose the elements of Claim 18. In particular Garreau fails to disclose a mobile computing device including "a housing having an expansion module bay for receiving an expansion module that includes an expansion card; a processor that can function as a USB controller configured to operate as a USB host or a USB device within the housing and is operationally coupled to a first power conversion circuit; and a USB connector coupled to the USB controller; the USB connector positioned within the housing for operationally coupling the expansion card to the mobile computing device via a USB interface and a second power conversion circuit, wherein at any given time only the first power conversion circuit or the second power conversion circuit performs power conversion". (Amended Claim 1).

Based on the foregoing amendment, Claim 18 is allowable over Garreau.

Similarly, Claims 25-26 that depend from Claim 18 are allowable over Garreau based on the foregoing amendment.

Garreau fails to disclose the elements of Claim 28. In particular, Garreau fails to disclose a mobile personal digital assistant that can operate both as a USB host or a USB device. Garreau fails to disclose the personal digital assistant, which includes "a housing having an expansion module bay for receiving an expansion card; a processor that can function as a USB controller configured to operate as a USB host or a USB device within the housing and is operationally coupled to a first power conversion circuit ; and a USB connector for the USB controller; the USB connector being positioned within the housing to operationally couple the expansion card to the mobile personal digital assistant via a USB interface, another USB connector and a second power conversion circuit, wherein at any given time only the first power conversion circuit or the second power conversion circuit performs power conversion. (Amended Claim 28)

Based on the foregoing amendment, Claim 28 is allowable over Garreau.

Therefore, it is respectfully requested that the Examiner's rejection of claim 18, 25-26 and 28 under 35 U.S.C. 102(e) as being anticipated by Garreau be withdrawn.

**Rejection under 35 U.S.C. § 103**

**Claims 19 and 29:**

In paragraph 3, page 4, the Examiner rejected Claims 19 and 29 under 35 USC § 103(a) as being unpatentable over Garreau in view of Huang (6,280,252). First, there is no motivation or suggestion to combine Garreau and Huang. Second, assuming arguendo, even if Garreau and Huang were combined, the combination will not disclose the elements of Claims 19 and 29. Claim 19 depends from Claim 18 and is allowable for at least the reasons for Claim 18. Claim 29 depends from Claim 28, and is allowable for at least the reasons for Claim 28. Therefore, in light of the above Amendments to independent Claim 18 and 28 this rejection is respectfully traversed.

Claims 1, 3-6 and 8-17:

In paragraph 6, page 7, the Examiner rejected Claims 1,3-6, and 8-17 under 35 USC § 103(a) as being unpatentable over Garreau in view of Kikinis (5,841,424) and further in view of Huang (6,280,252). In light of the above Amendments to independent Claims 1, this rejection is respectfully traversed.

The combination of Garreau, Kiknis and Huang (or the individual references themselves) fail to disclose the features of amended Claim 1. In particular, Garreau, Kiknis and Huang fail to disclose, “a Mobile computing device that can operate both as a host or a device”, which includes, a processor that can function as a USB controller configured to operate as a USB host or a USB device and is operationally coupled to a first power conversion circuit; a housing having an expansion module bay for receiving an expansion module that includes an expansion card; wherein the expansion card is operationally coupled to the mobile computing device via a first USB connector and a second USB connector positioned in the housing to mate with the first USB connector and the expansion card interfaces with a USB interface and a second power conversion circuit, which is coupled between the USB interface and the first USB connector; and the first and second USB connectors have a form factor that is different than a standard USB form factor; and at any given time only the first power conversion circuit or the second power conversion circuit performs power conversion. (Amended Claim 1)

The Examiner has relied on Kikinis (US Patent No. 5,841,424) stating that Kikinis teaches “a conversion circuit (USB adapter Fig. 6) coupled between USB devices (col. 5, lines 52-65)”. (Office Action, Page 6, Section 6). First, there is no motivation or suggestion to combine Garreau and Kikinis. Second, assuming arguendo, even if Garreau and Kikinis were combined, the combination will not disclose the elements of amended Claim 1. For example, Kikinis discloses a USB keyboard which is different from the “expansion card” of the amended claims.

Huang does not add to the deficiency of Garreau and Kikinis, because first, there is no motivation or suggestion to combine Garreau, Kikinis and Huang; and second, assuming *arguendo*, even if Garreau, Kikinis and Huang were combined, the combination will not disclose the elements of amended Claim 1. Huang discloses a "cable connector" in "an insulative housing defining plurality of passageways, a plurality of terminals received in the passageways of the insulative housing, an upper shell, a lower shell and a casing portion enveloping the upper shell and the lower shell." [Huang, Abstract]. The cable connector assembly of Huang does not disclose the limitations of amended Claim 1. Therefore, this rejection is respectfully traversed. Accordingly, withdrawal of Examiner's rejection of Claims 1 is respectfully requested.

Claims 3-6 and 8-17 depend directly or indirectly from Claim 1, and are patentable over Garreau, Kikinis and Huang for at least the reasons given above with respect to Claim 1. Therefore, this rejection is respectfully traversed. Accordingly, withdrawal of Examiner's rejection of Claims 3-6 and 8-17 is respectfully requested.

Claims 20-24 and 30-34:

In paragraph 4, page 4, the Examiner rejected Claims 20-24 and 30-34 under 35 USC § 103(a) as being unpatentable over Garreau in view of Kikinis. Claims 20 and 30 have been cancelled. Claims 21-24 depend directly or indirectly from Claim 18 and Claims 31-34 depend directly or indirectly from Claim 28. Garreau and Kikinis fail to disclose the elements of Claims 21-24 and 31-34 because, first, there is no motivation or suggestion to combine Garreau and Kikinis; and second, assuming *arguendo*, even if Garreau and Kikinis were combined, the combination will not disclose the elements of amended Claims 18 and 28 (and hence Claims 21-24 and 31-34, respectively).

Therefore, as discussed above, in light of the above Amendments to independent Claims 18 and 28, this rejection is respectfully traversed. Accordingly, withdrawal of Examiner's rejection of Claims 21-24 and 31-34 is respectfully requested.

Claim 27:

In paragraph 5, page 6, the Examiner rejected Claim 27 under 35 USC § 103(a) as being unpatentable over Garreau in view of Kikinis. Garreau and Kikinis by themselves or in combina-

tion fail to disclose "a mobile personal digital assistant that can operate both as a USB host or a USB device", which includes, a housing having an expansion module bay for receiving an expansion card; a processor that can function as a USB controller configured to operate as a USB host or a USB device within the housing and is operationally coupled to a first power conversion circuit; and a USB connector for the USB controller; the USB connector being positioned within the housing to operationally couple the expansion card to the mobile personal digital assistant via a USB interface, another USB connector and a second power conversion circuit, wherein at any given time only the first power conversion circuit or the second power conversion circuit performs power conversion.

In light of the above Amendments to independent Claims 27, this rejection is respectfully traversed. Accordingly, withdrawal of Examiner's rejection of Claim 27 is respectfully requested.

#### CONCLUSION

For the foregoing reasons, Applicant believes Claims 1, 3-6, 8-19, 21-29, 31-34 are allowable, and a notice of allowance is respectfully requested. If the Examiner has any questions regarding the application, the Examiner is invited to call the undersigned Attorney at (949) 955-1920.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, PO Box 1450, Alexandria, VA 22231-1450 on \_\_\_\_\_.

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Date of Signature